

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

-against-

AFFIRMATION
11 CR 111 (NRB)

ALWAR POURYAN, ET AL.

Defendants.

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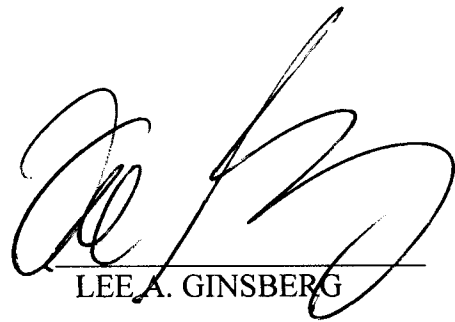
LEE A. GINSBERG, an attorney duly admitted to practice before the Court, hereby
affirms, under penalty of perjury that the following is true:

1. I am the attorney for the Defendant Alwar Pouryan (the “Defendant”) and I am fully familiar with the facts and circumstances of the instant case.
2. This Affirmation is submitted in support of Defendant’s motion, pursuant to Rule 12(b) of the Federal Rules of Criminal Procedure, seeking (1) an Order dismissing the Indictment for lack of jurisdiction; (2) an Order striking surplusage from the Indictment; (3) an Order requiring 404(b) type evidence at least one month prior to any trial date; (4) an Order requiring the government to provide Brady and related material; (5) an Order permitting the Defendant to join in all motions of his codefendants that are not inconsistent with the relief requested herein; (6) an Order granting such other relief as this Court deems just and proper.
3. The relief sought should be granted for the reasons fully explained in the memorandum of law which accompanies the instant motion. All statements therein are made upon personal knowledge, or upon information and belief, the source of the information and the grounds for belief being my conversations with my client, and a review of discovery material.

4. I further certify that pursuant to Local Criminal Rule 16.1 we have conferred with counsel for the government in an effort in good faith to resolve all discovery issues without the intervention of the court.

WHEREFORE, the motion should be granted in all respects.

Dated: New York, New York
May 1, 2012



LEE A. GINSBERG